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18 || *Attorneys for Defendant:
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

22 WAYMO LLC,
23 Plaintiff,
24 v.
25 UBER TECHNOLOGIES, INC.;
26 OTTOMOTTO LLC; OTTO TRUCKING
27 LLC,
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF TODD A. BOOCK IN
SUPPORT OF OTTO TRUCKING LLC'S
SUR-REPLY IN SUPPORT OF ITS
OPPOSITION TO WAYMO'S MOTION
FOR SANCTIONS**

Courtroom: 8 (19th Floor)
Judge: Hon. William Alsup
Trial Date: December 4, 2017

1 I, Todd A. Boock, declare as follows:

2 1. I am Counsel at the law firm of Goodwin Procter, LLP and counsel of record for
3 defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters
4 within my own personal knowledge and if called as a witness, I could and would competently
5 testify to the matters set forth herein. I make this declaration in support of Otto Trucking’s Sur-
6 Reply in Support of its Opposition to Waymo’s Motion for Sanctions.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of a September 18, 2017 e-
8 mail from Felipe Corredor of Quinn Emanuel, Waymo’s counsel, to all defense counsel. In the e-
9 mail, Mr. Corredor complains that publicly-filed, redacted exhibits contain information that
10 Waymo had designated as confidential.

11 3. Attached hereto as Exhibit 2 is a true and correct copy of a September 18, 2017 e-
12 mail from Andrea Pallios Roberts of Quinn Emanuel to all defense counsel. In the e-mail, Ms.
13 Roberts complains that publicly-filed, redacted exhibits contain information that Waymo had
14 designated as confidential.

15 4. Attached hereto as Exhibit 3 is a true and correct copy of a September 25, 2017 e-
16 mail from David Perlson to Esther Kim Chang, copying all defense counsel, in which Mr. Perlson
17 demands that Uber provide its filing protocol in writing. Below that is a September 24, 2017 e-
18 mail from Mr. Perlson to Ms. Chang, in which Mr. Perlson complains that publicly-filed, redacted
19 exhibits contain information that Waymo had designated as confidential.

20 5. Prior to it being raised during my deposition of Bruce Hartley, Waymo never
21 contacted our team to object or raise any issue as to our public filing of Exhibit 10 or any of the
22 subsequent filings containing the domain name.

23 I declare under penalty of perjury under the laws of the United States that the foregoing is
24 true and correct. Executed this 6th day of October, 2017 in Los Angeles, California.

25 /s/ Todd A. Boock
26 Todd A. Boock

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing document including all of its
3 attachments with the Clerk of the Court for the United States District Court for the Northern
4 District of California by using the CM/ECF system on **October 6, 2017**. I further certify that all
5 participants in the case are registered CM/ECF users and that service of the publicly filed
6 documents will be accomplished by the CM/ECF system.

7 I certify under penalty of perjury that the foregoing is true and correct. Executed on
8 **October 6, 2017**.

9 /s/ *Neel Chatterjee*
10 NEEL CHATTERJEE

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